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May 26, 2023

Via ECF

The Hon. Katherine Polk Failla, U.S.D.J.
United States District Court, Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Lanau Aguilar v. Carben Construction Inc. et al*
Case No.: 1:22-cv-09685-KPF

MEMO ENDORSED

Dear Honorable Judge Failla:

This law firm represents Francisco Lanau Aguilar (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 2(C) and 2(D), this letter respectfully serves to request an extension of time to file Plaintiff’s motion for default judgment from June 2, 2023, to, through and including July 2, 2023.

This is the first request of its kind. If granted, this request will not affect any other Court scheduled deadlines.

The basis of this request is that the undersigned will be traveling overseas from June 1, 2023, to, through and including, June 17, 2023, and will have limited availability during this time. The undersigned anticipates being in a position to finalize, and file, Plaintiff’s motion for default judgment on or before July 2, 2023.

In light of the foregoing, Plaintiff respectfully requests that Plaintiff’s deadline to file the motion for default judgment be extended from June 2, 2023, to, through and including July 2, 2023.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi
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Application GRANTED. Plaintiff is directed to file papers in support of a default judgment by July 5, 2023.

The Clerk of Court is directed to terminate the pending motion at docket entry 34.

Dated: May 30, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE